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9 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 JIANDE ZHOU,

16 Defendant.

No. 2:23-CR-524-DMG-14

GOVERNMENT'S REQUEST FOR  
ADDITIONAL TIME TO FILE OPPOSITION  
TO DEFENDANT JIANDE ZHOU'S MOTION  
FOR RECONSIDERATION OF BOND;  
DECLARATION OF JULIE J. SHEMITZ

Hearing Date: June 20, 2024

Hearing Time: 10:00 a.m.

Location: Courtroom of the  
Hon. Michael R.  
Wilner

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21 Plaintiff United States of America, by and through its counsel  
22 of record, the United States Attorney for the Central District of  
23 California and Assistant United States Attorney Julie J. Shemitz,  
24 hereby files its request for additional time to respond to the motion  
25 for reconsideration of bond for defendant Jiande Zhou.

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1           This request is based upon the attached declaration of Julie J.  
2 Shemitz, the files and records in this case, and such further  
3 evidence and argument as the Court may permit.

4     Dated: June 14, 2024

Respectfully submitted,

5                     E. MARTIN ESTRADA  
6                     United States Attorney

7                     MACK E. JENKINS  
8                     Assistant United States Attorney  
9                     Chief, Criminal Division

10                    /s/  
11                    \_\_\_\_\_  
12                    JULIE J. SHEMITZ  
13                    Assistant United States Attorney

14                    Attorneys for Plaintiff  
15                    UNITED STATES OF AMERICA  
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**DECLARATION OF JULIE J. SHEMITZ**

I, Julie J. Shemitz, declare and state the following:

1. On April 4, 2024, a grand jury for the Central District of California returned a ten-count indictment charging defendant Jiande Zhou and 23 other defendants with conspiracy to aid and abet drug distribution in violation of Title 21, United States Code, Section 846, conspiracy to launder monetary instruments in violation of Title 18, United States Code, Section 1956(h), conspiracy to operate an unlicensed money remitting business in violation of Title 18, United States Code, Sections 371 and 1960. Defendant was also charged with possession with intent to distribute over 50 grams of methamphetamine ("ice"), that is, over seven kilograms of methamphetamine that was approximately 96% pure, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

2. Defendant appeared before the Court and was arraigned on the indictment on November 13, 2023. The bond hearing was continued until November 21, 2023. On that date the government's motion for detention was heard and granted. Defendant has been detained since that date.

3. On May 20, 2024, defendant filed the instant motion for reconsideration of the order of detention. The motion was referred to this Court which set a briefing schedule and ordered a hearing be held on June 20, 2024.

4. The briefing schedule required the United States to respond to defendant's motion by noon on June 14, 2024.

5. In addition, I have spoken with defense counsel Kevin Gres. Mr. Gres and I agreed to discuss the issue of bond and Mr. Gres informed me that he needed to consult with potential sureties

1 regarding this matter. However, I did not receive a response from  
2 Mr. Gres with any additional information.

3 6. I have spoken with Mr. Gres today and he informed me that  
4 he was under the impression that the matter had been taken off  
5 calendar so he had not yet gathered any additional information.

6 7. For these reasons, as well as the crush of additional  
7 pressing matters that arose in the last few days, including the  
8 arrests of a fugitive in an unrelated case, I have been unable to  
9 complete the government's response to the motion to reconsider bond  
10 by the noon deadline.

11 8. With apologies to the Court, I therefore request a brief  
12 extension, until midnight today, to complete and file the response.

13 I declare under penalty of perjury under the laws of the United  
14 States of America that the foregoing is true and correct and that  
15 this declaration is executed at Los Angeles, California, on June 14,  
16 2024.

17 /s/

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JULIE J. SHEMITZ